

1541  
IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

WILLIAM FIELDER  
CASSANDRA RANGEL

Criminal No. 21-425

[UNDER SEAL]

(18 U.S.C. § 1349)

INDICTMENT

COUNT ONE

The grand jury charges:

INTRODUCTION

FILED

OCT 05 2021

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

1. At all times material to this Indictment, the United States government has been taking steps to slow the spread of the novel coronavirus (COVID-19) and to mitigate its impact on the public's health and economic well-being.

2. On March 13, 2020, the President declared the ongoing COVID-19 pandemic to be an emergency under Section 501(b) of the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

3. On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was signed into law. The CARES Act created the Pandemic Unemployment Assistance (PUA) program, which provided unemployment benefits to individuals not eligible for regular unemployment compensation or extended unemployment benefits.

4. The CARES Act also provided for an emergency increase in unemployment compensation benefits, referred to as Federal Pandemic Unemployment Compensation (FPUC). FPUC provided eligible individuals with \$600.00 per week in addition to the weekly benefit amount they received from certain other unemployment compensation programs, to include PUA.

5. The PUA and FPUC programs (collectively, “pandemic benefits”) are administered by the various states, including the Commonwealth of Pennsylvania, but their benefits are funded in part by the federal government. In order to receive pandemic benefits, an applicant must access a website maintained by the Commonwealth of Pennsylvania and file a claim.

6. Individuals are only eligible for PUA benefits if they are unemployed for reasons related to the COVID-19 pandemic and are available to work.

7. Once an applicant is at the website, the individual is required to enter personal identifying information, including their name, date of birth, social security number, email, phone number, and physical address. An applicant is then required to answer a series of questions to determine their eligibility and payment amount.

8. Upon completion, the application is submitted to the Pennsylvania Department of Labor for review. If approved, the applicant is notified of the amount they will be paid per PUA, which is referred to as the “benefit amount,” and the amount they will be paid per FPUC, which is referred to as the “stimulus amount.”

9. Following the submission of a claim, and in order to receive benefits for a week of unemployment, an individual must certify eligibility for PUA benefits for that week. Once certification is submitted, the applicant is notified of the “benefit amount” and the “stimulus amount” of their submitted claim.

10. From on or about August 30, 2019, and at all times material to this Indictment, the defendant, WILLIAM FIELDER, was imprisoned at Allegheny County Jail, where he lacked the means to file a claim for pandemic benefits. During that period, as the defendants, WILLIAM FIELDER and CASSANDRA RANGEL, well knew, WILLIAM FIELDER was

unavailable to accept work and was unemployed as a result of his imprisonment, rather than as a result of COVID-19.

THE CONSPIRACY AND ITS OBJECTS

11. From in and around June 2020, and continuing thereafter until in and around August 2020, in the Western District of Pennsylvania, the defendants, WILLIAM FIELDER and CASSANDRA RANGEL, knowingly and willfully did conspire, combine, confederate and agree together and with each other, to commit Mail Fraud, in violation of Title 18, United States Code, Section 1341.

MANNER AND MEANS OF THE CONSPIRACY

12. It was a part of the conspiracy that WILLIAM FIELDER decided to seek pandemic benefits even though, as he then well knew, he was not eligible to receive them.

13. It was further a part of the conspiracy that WILLIAM FIELDER discussed and approved the input of his personal identifying information by CASSANDRA RANGEL, so that she could file a claim on his behalf with the Pennsylvania Department of Labor.

14. It was further a part of the conspiracy that CASSANDRA RANGEL used that personal identifying information to file a claim for pandemic benefits on WILLIAM FIELDER'S behalf. As part of that claim, CASSANDRA RANGEL knowingly and falsely represented that WILLIAM FIELDER was unemployed as a result of COVID-19 and that he was available to work. As the defendants, CASSANDRA RANGEL and WILLIAM FIELDER, then well knew, these representations were false.

15. It was further a part of the conspiracy that by fraudulently applying for pandemic benefits, debit card payments were issued to WILLIAM FIELDER through the United States mail and sent to CASSANDRA RANGEL'S home address.

All in violation of Title 18, United States Code, Section 1349.

A True Bill,

A handwritten signature in cursive script, appearing to read "G. M. S.", written over a horizontal line.

Foreperson

A handwritten signature in cursive script, appearing to read "S. R. Kaufman", written over a horizontal line.

STEPHEN R. KAUFMAN  
Acting United States Attorney  
PA ID No. 42108